

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PARADISE MORGAN,

Plaintiff,

– against –

LULULEMON ATHLETICA INC.,

Defendant.

23CV434 (VSB)

**DEFENDANT'S  
NOTICE OF MOTION  
TO DISMISS  
PLAINTIFF'S  
COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the annexed Memorandum of Law in Support of Defendant's Motion to Dismiss, the Local Rules for the United States District Court for the Southern District of New York, and the Individual Practice Rules of this Court, Defendant lululemon athletica inc. hereby moves for an Order dismissing all claims for relief set forth in the Complaint with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Defendant's Motion is based on the accompanying Memorandum of Law, all files, records and proceedings therein, the oral arguments of counsel, and upon any other information that may be required by the Court.

Respectfully submitted this 5<sup>th</sup> day of May, 2023.

**SQUIRE PATTON BOGGS (US) LLP**

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